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July 29, 2008

VIA FACSIMILE
AND REGULAR MAIL

Honorable Esther Salas, U.S.M.J.
United States District Court
M.L. King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street - Room 2060
Newark, New Jersey 07101

Re: N.V.E., Inc. v. Jesus Palmeroni, et al.
Docket No. 2:06-CV-05455(HAA)(ES)
Our File No. 6026-044

Dear Judge Salas:

We represent plaintiff and write with the consent of defendants to request an extension of discovery. Under the present case management order, discovery is to end on August 31. The parties have been unable to schedule mutually acceptable dates for depositions. We request a 45 day extension to October 15.

In addition to routine conflicts, the scheduling here is complicated by Defendant Palmeroni's wedding and honeymoon, a trial for Mr. Samaro and defendants' intention to schedule out of state depositions. Under the circumstances, we respectfully request that the discovery period be extended to October 15, 2008.

Respectfully,


DAVID G. WHITE

DGW/lgc

cc: Neil Grossman, Esq.
C. Ronald Stafford, Jr., Esq.
Robert Occhifinto
Samuel J. Samaro, Esq.

Is Ordered:
Gottfals 7/31/08